

FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

**CITY OF MOUNTAIN VIEW
2030 GENERAL PLAN AND
GREENHOUSE GAS REDUCTION PROGRAM
SAN ANTONIO CHANGE AREA**

State Clearinghouse #: 2013092026



Mountain View

2030

Prepared for: City of Mountain View

Prepared by: ICF International

APRIL 2015

FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

CITY OF MOUNTAIN VIEW 2030 GENERAL PLAN AND GREENHOUSE GAS REDUCTION PROGRAM – SAN ANTONIO CHANGE AREA

STATE CLEARINGHOUSE #2013092026

PREPARED FOR:

City of Mountain View
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April 2015



ICF International. 2015. *Final Subsequent Environmental Impact Report, City of Mountain View 2030 General Plan and Greenhouse Gas Reduction Program – San Antonio Change Area*. April. (ICF 00395.13.) San Francisco, CA.
Prepared for City of Mountain View, Mountain View, CA.

Contents

List of Tables	ii
List of Acronyms and Abbreviations	iii
Chapter I Introduction	I-1
Chapter II Comments and Responses	II-1
Comments Received on the Draft EIR.....	II-1
Responses to Comments	II-1
Letter 1: Governor’s Office of Planning and Research	II-2
Responses to Comment Letter 1 (OPR)	II-7
Letter 2: California Department of Transportation (Caltrans).....	II-8
Responses to Comment Letter 2 (Caltrans)	II-11
Letter 3: Santa Clara Valley Transportation Authority (VTA).....	II-16
Responses to Comment Letter 3 (VTA).....	II-19
Letter 4: City of Palo Alto Planning and Community Environment Department	II-22
Responses to Comment Letter 4 (City of Palo Alto Planning and Community Environment Department).....	II-24
Chapter III Text Revisions to the Draft SEIR	III-1
Chapter IV – Setting, Impacts, and Mitigation Measures	III-2
IV.B Population, Housing, and Employment.....	III-2

Draft Subsequent Environmental Impact Report (Not Reprinted [CD inside back cover])

Tables

	Page
II-1 List of Commenters	II-1

Acronyms and Abbreviations

2030 General Plan EIR	City of Mountain View 2030 General Plan and Greenhouse Gas Reduction Program Environmental Impact Report
BMPs	best management practices
Caltrans	California Department of Transportation
CEQA	California Environmental Quality Act
City	City of Mountain View
CMP	Congestion Management Program
GGRP	Greenhouse Gas Reduction Program
HOV	high-occupancy vehicle
LOS	level of service
OPR	Office of Planning and Research
SEIR	Subsequent Environmental Impact Report
sf	square feet
TDF	travel demand forecasting
TDM	transportation demand management
TIA	traffic impact analysis
VTA	Santa Clara Valley Transportation Authority

Chapter I

Introduction

This Final Subsequent Environmental Impact Report (SEIR) for the City of Mountain View 2030 General Plan and Greenhouse Gas Reduction Program – San Antonio Change Area Project (Project) has been prepared in compliance with the California Environmental Quality Act (CEQA) and includes the following:

- Draft SEIR, November 2014 (bound separately, not reprinted); and
- Comments and Responses to Comments (this document).

The City of Mountain View (City) is the CEQA Lead Agency for the Project. As required by CEQA, the Draft SEIR was made available to the public and regulatory agencies for review and comment during a 45-day period between November 24, 2014, and January 8, 2015. Per CEQA Guidelines Section 15132, the Final SEIR shall consist of:

- a. The Draft SEIR or a revision of the draft;
- b. Comments and recommendations received on the Draft SEIR, either verbatim or in a summary;
- c. A list of persons, organizations, and public agencies commenting on the Draft SEIR;
- d. The response of the Lead Agency to significant environmental points raised in the review and consultation process; and
- e. Any other information added by the Lead Agency.

This document contains the comments received on the November 2014 Draft SEIR and responses to those comments (refer to Chapter II, *Comments and Responses*), along with appropriate revisions to the Draft SEIR in the form of an errata (refer to Chapter III, *Text Revisions to the Draft SEIR*). The November 2014 Draft SEIR is incorporated by reference and has been provided on a compact disc inside the back cover of this document.

Comments Received on the Draft SEIR

This chapter includes all comments received on the Draft SEIR. The comment letters (i.e., commenters) have been numbered as shown in Table II-1. The individual comments within each letter have been numbered in the right margins.

Table II-1. List of Commenters

Letter #	Commenter	Date
1	Governor's Office of Planning and Research (OPR)	January 6, 2015
2	California Department of Transportation (Caltrans)	January 2, 2015
3	Santa Clara Valley Transportation Authority (VTA)	January 8, 2015
4	City of Palo Alto Planning and Community Environment	January 15, 2015

Responses to Comments

This chapter also includes responses for each of the numbered comments identified in the comment letters. Each response briefly summarizes the comment, provides a response to the comment, and then identifies if revisions to the Draft SEIR are required or have been made for clarification. No changes were made to the Draft SEIR as a result of comments received.

In responding to comments, CEQA does not require a Lead Agency to conduct every test or perform all research, study, or experimentation recommended or demanded by a commenter. Rather, a Lead Agency need only respond to significant environmental issues and does not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines Sections 15088, 15204).

Letter 1



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

January 6, 2015

Margaret Netto
City of Mountain View
500 Castro Street
Mountain View, CA 94039-7540

Subject: SEIR to the City of Mountain View 2030 General Plan and Greenhouse Gas Reduction Program -
San Antonio Change Area
SCH#: 2013092026

Dear Margaret Netto:

The State Clearinghouse submitted the above named Supplemental EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on January 5, 2015, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

1-1

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures

cc: Resources Agency
1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report State Clearinghouse Data Base

SCH# 2013092026
Project Title SEIR to the City of Mountain View 2030 General Plan and Greenhouse Gas Reduction Program - San Antonio Change Area
Lead Agency Mountain View, City of

Type **SIR** Supplemental EIR
Description Note: Reference SCH# 2011012069

Since adoption of the 2030 General Plan EIR, additional development applications have been submitted to the City of Mountain View that generally comply with 2030 General Plan land use designations but would result in development intensity in the San Antonio Change Area beyond what was analyzed in the 2030 General Plan EIR. The Project evaluated in the Subsequent EIR is a net new total allowable development in the San Antonio Change Area of approximately 879,000 sf of office and 170 lodging rooms, and a 120,000 sf decrease in retail. Directly related to the analysis of additional office space and lodging rooms, the SEIR also analyzes increases in projected employment in the San Antonio Change Area.

Lead Agency Contact

Name Margaret Netto
Agency City of Mountain View
Phone (650) 903-6306 **Fax**
email Margaret.Netto@mountainview.gov
Address 500 Castro Street
City Mountain View **State** CA **Zip** 94039-7540

Project Location

County Santa Clara
City Mountain View
Region
Lat / Long 37° 24' 20" N / 122° 06' 32" W
Cross Streets El Camino Real, San Antonio, CA
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways Hwy 65, 82
Airports Moffett Airfield Base
Railways Caltrain
Waterways Permanente Creek, Adobe Creek, Hale Creek
Schools Monta Loma ES
Land Use Community Precise Plan (P-9) / Mixed-Use Corridor

Project Issues Air Quality; Noise; Population/Housing Balance; Public Services; Sewer Capacity; Solid Waste; Traffic/Circulation; Water Supply; Growth Inducing; Landuse; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 3; Office of Historic Preservation; Department of Parks and Recreation; San Francisco Bay Conservation and Development Commission; Department of Water Resources; California Highway Patrol; Caltrans, District 4; Air Resources Board; Regional Water Quality Control Board, Region 2; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

Date Received 11/21/2014 **Start of Review** 11/21/2014 **End of Review** 01/05/2015

Jan 02 2015 4:51PM HP LASERJET FAX

P. 1

STATE OF CALIFORNIA - CALIFORNIA STATE TRANSPORTATION AGENCY

ROMUND G. BROWN Jr., Governor

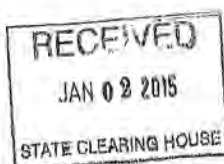
DEPARTMENT OF TRANSPORTATION

DISTRICT 4
P.O. BOX 23650
OAKLAND, CA 94623-0650
PHONE (510) 286-6053
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www.dot.ca.gov

CLEAR
1-5-15
E



Serious Drought
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January 2, 2015

SCL000219
SCL/GEN/PM VAR
SCH# 2013092026

Ms. Margaret Netto
Community Development Department
City of Mountain View
500 Castro Street
Mountain View, CA 94039

Dear Ms. Netto:

2030 General Plan and Greenhouse Gas Reduction Program – Draft Supplemental Environmental Impact Report (DSEIR)

Thank you for continuing to include the California Department of Transportation (Caltrans) in the environmental review process for the Plan referenced above. We have reviewed the DSEIR and have the following comments to offer.

Traffic Impact Analysis (TIA)

California Public Resources Code 21159.28 provides for streamlined analysis of impacts from cars and light duty truck trips on the State Highway System (SHS) provided certain conditions are met. 21159.28(c) states (when referencing streamlining provisions) that "nothing in the foregoing relieves any project from a requirement to comply with any conditions, exactions, or fees for the mitigation of the project's impacts on the structure, safety or operations of the regional transportation network or local streets and roads."

If projects proposed under this Plan do not qualify for streamlining provisions under SB 375 regarding traffic impact analysis, or there are impacts to the structure, safety or operations of the SHS, based on the project's location and potential for significant traffic impacts, Caltrans requests a TIA to assess the impact of this project on the SHS and the adjacent road network. We recommend using Caltrans' *Guide for the Preparation of Traffic Impact Studies* (TIS Guide) for determining which scenarios and methodologies to use in the analysis. The TIS Guide is a starting point for collaboration between the lead agency and Caltrans in determining when a TIA is needed. It is available at the following website address:
http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf.

The Plan is likely to generate at least 100 vehicles per hour (vph), potentially impacting State Route (SR) 82 (El Camino Real), U.S. Highway (U.S.) 101, SR 237, and SR 85. Caltrans

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

JAN 02 2015 4:13 PM RE: LINDSEY FRA

P-2

Ms. Margaret Netto/City of Mountain View

January 2, 2015

Page 2

recommends the TIA include a trip generation table. Also, because the report adopts measurement of effectiveness (MOE) such as vehicle miles traveled (VMT), LOS, V/C to evaluate transportation impact upon freeway/roadway segments, Caltrans recommends the TIA include traffic turning movement for key study intersections, project driveways, and interchanges for the Plan's four scenarios.

The DSEIR is based on 2035 projections and reports, even though the Valley Transportation Plan (VTP) 2040 is now available. Caltrans recommends the City of Mountain View (City) use the VTP2040 projections for the DSEIR where applicable.

Page 14 mentions, a bicycle improvement plan on California Street (i.e., "The effects of this improvement project will be evaluated in a separate study"). While an explanation is provided in the DSEIR ("The California Street study may require an update to the General Plan Street Typology map"), the transportation section would be improved by a discussion of the multi-modal, active transportation elements that are envisioned for the bicycle improvement plan. Particularly, since TRA-1 through TRA-4 (p. 11-5 and pp. IV.C-4 to IV.C-12) state that the transportation and circulation impacts are significant and unavoidable, Caltrans recommends further discussion in the DSEIR of additional transit and active transportation strategies as feasible mitigation measures.

Caltrans views all transportation improvements as opportunities to improve safety, access, and mobility for all travelers in California and recognizes bicycle, pedestrian, and transit modes as integral elements of the transportation system.

Vehicle Trip Reduction

Caltrans encourages the City to locate any needed housing, jobs and neighborhood services near major mass transit centers, with connecting streets configured to facilitate walking and biking, as a means of promoting mass transit use and reducing regional vehicle miles traveled and traffic impacts on the State highways.

Caltrans also encourages the City to develop and assess the benefits of specific Travel Demand Management (TDM) measures that promote walking, bicycling and transit to reduce congestion on State facilities. These measures could include lower parking ratios, car-sharing programs, bicycle parking and showers for employees, and providing transit passes to residents and employees, among others.

In addition, secondary impacts on pedestrians and bicyclists resulting from any traffic impact mitigation measures should be recognized and analyzed in the Plan TIA and project-specific TIAs. The analysis should describe any pedestrian and bicycle mitigation measures and safety countermeasures that would in turn be needed as a means of maintaining and improving access to transit facilities and reducing vehicle trips and traffic impacts on State highways.

CEQA Streamlining

Local jurisdictions and land use development infill project proponents should and are encouraged to coordinate and consult early with Caltrans District Local Development – Intergovernmental

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JAN 02 2015 11:01 AM RE: LBNKJEL FNA

P13

Ms. Margaret Netto/City of Mountain View
January 2, 2015
Page 3

Review (LD-IGR) office on any land use proposal, based on the project's location and potential for significant traffic impacts, to enable consideration of the potential site specific drainage, visual, access, and operational safety impacts. Even if cumulative impacts were addressed in a prior environmental clearance document there may be direct impacts of concern with the project-level proposal. A CEQA exemption is still an adequate environmental clearance as long as any necessary mitigation features are included as part of the project.

Voluntary Contribution Program

State highway facilities are critical to regional and interregional traffic in the San Francisco Bay region. They are vital to commuting, freight, and recreational traffic and are among the most congested regional facilities. Given the scale of the Plan and the expected traffic generated, this Plan is likely to have a cumulatively significant regional impact to the already congested SHS.

Caltrans encourages the City to participate in Santa Clara Valley Transportation Authority's (VTA) voluntary contribution program and plan for the impact of future growth on the regional transportation system. Contributions would be used to help fund regional transportation programs that improve the transportation system to lessen future traffic congestion, improve mobility by reducing time delays, and maintain reliability on major roadways throughout the San Francisco Bay Area. Reducing delays on State facilities will not only benefit the region, but also reduce any queuing on local roadways caused by highway congestion.

Should you have any questions regarding this letter, please contact Brian Brandert of my staff at (510) 286-5505 or brian.brandert@dot.ca.gov.

Sincerely,



ERIK ALM, AICP
District Branch Chief
Local Development - Intergovernmental Review

- c: Scott Morgan, State Clearinghouse
Robert Swierk, Santa Clara Valley Transportation Authority (VTA) -- electronic copy
Robert Cunningham, Santa Clara Valley Transportation Authority (VTA) -- electronic copy

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Responses to Comment Letter 1 (OPR)

Comment 1-1

The comment informs the City that the State Clearinghouse received the Draft SEIR and submitted it to select agencies for review. The comment letter from Caltrans is attached.

Comment noted. This comment does not concern the adequacy of the SEIR. The comment letter from Caltrans is responded to in Response to Comment Letter 2. No revisions to the Draft SEIR are necessary.

Letter 2

Jan 02 2015 4:53PM HP LASERJET FAX

P. 1

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION

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January 2, 2015

SCL000219
SCL/GEN/PM VAR
SCH# 2013092026

Ms. Margaret Netto
Community Development Department
City of Mountain View
500 Castro Street
Mountain View, CA 94039

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Environmental Impact Report (DSEIR)**

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2-1

If projects proposed under this Plan do not qualify for streamlining provisions under SB 375 regarding traffic impact analysis, or there are impacts to the structure, safety or operations of the SHS, based on the project's location and potential for significant traffic impacts, Caltrans requests a TIA to assess the impact of this project on the SHS and the adjacent road network. We recommend using Caltrans' *Guide for the Preparation of Traffic Impact Studies (TIS Guide)* for determining which scenarios and methodologies to use in the analysis. The TIS Guide is a starting point for collaboration between the lead agency and Caltrans in determining when a TIA is needed. It is available at the following website address:
http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf.

The Plan is likely to generate at least 100 vehicles per hour (vph), potentially impacting State Route (SR) 82 (El Camino Real), U.S. Highway (U.S.) 101, SR 237, and SR 85. Caltrans

2-2

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p. 2

Ms. Margaret Netto/City of Mountain View
January 2, 2015
Page 2

recommends the TIA include a trip generation table. Also, because the report adopts measurement of effectiveness (MOE) such as vehicle miles traveled (VMT), LOS, V/C to evaluate transportation impact upon freeway/roadway segments, Caltrans recommends the TIA include traffic turning movement for key study intersections, project driveways, and interchanges for the Plan's four scenarios.

2-2 Cont.

2-3

The DSEIR is based on 2035 projections and reports, even though the Valley Transportation Plan (VTP) 2040 is now available. Caltrans recommends the City of Mountain View (City) use the VTP2040 projections for the DSEIR where applicable.

2-4

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2-5

Caltrans views all transportation improvements as opportunities to improve safety, access, and mobility for all travelers in California and recognizes bicycle, pedestrian, and transit modes as integral elements of the transportation system.

Vehicle Trip Reduction

Caltrans encourages the City to locate any needed housing, jobs and neighborhood services near major mass transit centers, with connecting streets configured to facilitate walking and biking, as a means of promoting mass transit use and reducing regional vehicle miles traveled and traffic impacts on the State highways.

2-6

Caltrans also encourages the City to develop and assess the benefits of specific Travel Demand Management (TDM) measures that promote walking, bicycling and transit to reduce congestion on State facilities. These measures could include lower parking ratios, car-sharing programs, bicycle parking and showers for employees, and providing transit passes to residents and employees, among others.

In addition, secondary impacts on pedestrians and bicyclists resulting from any traffic impact mitigation measures should be recognized and analyzed in the Plan TIA and project-specific TIAs. The analysis should describe any pedestrian and bicycle mitigation measures and safety countermeasures that would in turn be needed as a means of maintaining and improving access to transit facilities and reducing vehicle trips and traffic impacts on State highways.

2-7

CEQA Streamlining

Local jurisdictions and land use development infill project proponents should and are encouraged to coordinate and consult early with Caltrans District Local Development – Intergovernmental

2-8

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p. 3

Ms. Margaret Netto/City of Mountain View
January 2, 2015
Page 3

Review (LD-IGR) office on any land use proposal, based on the project's location and potential for significant traffic impacts, to enable consideration of the potential site specific drainage, visual, access, and operational safety impacts. Even if cumulative impacts were addressed in a prior environmental clearance document there may be direct impacts of concern with the project-level proposal. A CEQA exemption is still an adequate environmental clearance as long as any necessary mitigation features are included as part of the project.

2-8 Cont.

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2-9

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Should you have any questions regarding this letter, please contact Brian Brandert of my staff at (510) 286-5505 or brian.brandert@dot.ca.gov.

Sincerely,



ERIK ALM, AICP
District Branch Chief
Local Development - Intergovernmental Review

c: Scott Morgan, State Clearinghouse
Robert Swierk, Santa Clara Valley Transportation Authority (VTA) – electronic copy
Robert Cunningham, Santa Clara Valley Transportation Authority (VTA) – electronic copy

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Responses to Comment Letter 2 (Caltrans)

Comment 2-1

The comment states that although California Public Resources Code Section 21159.28 provides for a streamlined analysis of impacts on the State Highway System under certain conditions, Caltrans requests that a traffic impact analysis (TIA) be completed to assess the impact on the State Highway System for all projects that do not concur with those conditions. Caltrans also requests that their Guide for the Preparation of Traffic Impact Studies be used to determine scenarios and methodologies for the analysis.

The San Antonio Change Area SEIR is intended to analyze the change in allowable development in the San Antonio Change Area beyond that analyzed in the *City of Mountain View 2030 General Plan and Greenhouse Gas Reduction Program Environmental Impact Report* (2030 General Plan EIR). The change in the allowable development in the San Antonio Change Area consists of an additional 800,000 square feet (sf) of offices and 170 lodging rooms, a reduction of 120,000 sf of retail, and a reallocation of 330 housing units and 80,000 sf of retail from the San Antonio Change Area to other areas within the city. The streamlining allowances of SB 375 were not used in the preparation of the SEIR or TIA. A TIA was prepared for the SEIR and is included as Appendix C of the Draft EIR.

The TIA was prepared following the *Caltrans Guide for the Preparation of Traffic Impact Studies*, Section III, Subheading B.1. The significance criteria used in the 2030 General Plan EIR for determining transportation-related impacts were applied. Significance determinations are based on applicable policies, regulations, goals, and guidelines defined by the City and adjacent jurisdictions and by the *2014 California Environmental Quality Act (CEQA) Guidelines*.

In accordance with the VTA Congestion Management Program (CMP), significant impacts on freeway segments under the jurisdiction of VTA occur when the addition of traffic from a proposed project causes freeway segment operations to deteriorate from an acceptable level (level of service [LOS] E) to an unacceptable level (LOS F).

In accordance with the *Caltrans Guide for the Preparation of Traffic Impact Studies*, significant traffic impacts on Caltrans freeway segments are defined to occur when a Caltrans freeway segment and other state route operations deteriorate from an acceptable level (LOS C/D cusp) to an unacceptable level (LOS D, E, or F).

If a segment is already operating at unacceptable levels, as defined by the controlling agency (i.e., Caltrans or VTA for freeway segments), an increase in traffic volume on the segment representing more than one percent of the facility's capacity is considered significant.

No revisions to the Draft SEIR are necessary.

Comment 2-2

The comment asks that a trip generation table be included in the TIA.

A program-level TIA was prepared to evaluate potential transportation and circulation impacts arising from the construction of new land uses within the San Antonio Change Area originally unaccounted for in the 2030 General Plan EIR. The TIA uses the same analysis tool that was used for the traffic assessment for the 2030 General Plan EIR (Appendix B of the 2030 General Plan EIR), the

City's travel demand forecasting (TDF) model, to prepare traffic projections. Inputs for the travel demand model include the land use in each traffic analysis zone and the roadway network. With these inputs, the TDF model completes complex calculations to match complementary land uses and connect their vehicle trip ends to determine the number of vehicle trips to and from each traffic analysis zone. Because of the type, mix, and locations of the land use changes in the San Antonio Change Area, the TDF model produced changes in traffic volumes on roadways throughout Mountain View and did not generate traditional trip generation tables typically found in a TIA. Although there are no traditional trip generation tables in the TIA, the results from the TDF model indicates the changes to outbound and inbound vehicle trips compared to the land use assumptions in the General Plan EIR. Specifically, compared to the General Plan EIR, the change in allowable development in the San Antonio Change Area results in a decrease of daily outbound vehicle trips by almost 2,600 (4 percent) and an increase of daily inbound vehicle trips by 500 (1 percent) from the traffic analysis zones within the San Antonio Change Area.

The proposed land use change is estimated to increase employment within the San Antonio Change Area by 2,300 jobs and decrease the population in the area by 660 people. Per the Institute of Transportation Engineers' standard rates, the change in allowable development results in a decrease in the number of daily trips by almost 2,900, an increase in the total number of AM peak-hour trips by 750, and an increase in the total number of PM peak-hour trips by 170 compared with the original land use assumptions in the 2030 General Plan EIR. (These estimates do not include any reduction for transportation demand management [TDM] or internalization.) Detailed trip generation tables may be required of future TIAs that will be completed for new development within the San Antonio Change Area but were not necessary for the transportation analysis in the SEIR. No revisions to the Draft SEIR are necessary.

Comment 2-3

The comment states that because the report adopts measures of effectiveness such as vehicle miles traveled, LOS, and volume-to-capacity ratios to evaluate roadway segments, the TIA should include traffic turning movements for key study intersections, project driveways, and interchanges for each of the four scenarios.

Because this is a subsequent EIR to the 2030 General Plan EIR, the travel demand model used for the 2030 General Plan EIR analysis was also used for the SEIR to estimate impacts on the capacity of roadway facilities on a link-level basis (not an intersection-level basis) in the city and nearby jurisdictions.

Because of the programmatic nature of the Project and SEIR, the transportation analysis was conducted using the City's TDF model to evaluate the system-wide transportation metrics, consistent with the 2030 General Plan EIR. The TDF model evaluated the following:

- Citywide vehicle miles traveled per service population
- Daily roadway segment volumes in Mountain View
- Peak-hour roadway segment volumes in adjacent jurisdictions

The land use changes associated with the Project would affect the vehicle performance measures listed above. The TDF model is currently the best tool available for developing long-range traffic forecasts for streets and highways within Mountain View and the adjacent jurisdictions. The roadway segment forecasts are useful metrics of Project impacts because, in urban conditions, when roadway segment operations fail, intersections also fail because intersections govern the roadway network capacity.

Detailed turning movement estimates may be required of future TIAs that will be completed for new development within the San Antonio Change Area but were not necessary for the transportation analysis in the SEIR, which is programmatic in nature. Additionally, detailed turning movement estimates were created as part of the San Antonio Precise Plan EIR (August 2014). The transportation analysis for the San Antonio Precise Plan identified one plan-related impact and no impacts in the cumulative condition (which reflects buildout of the approved general plan land use).

No revisions to the Draft SEIR are necessary.

Comment 2-4

The comment states that the Draft SEIR is based on 2035 projections when 2040 projections are now available and recommends the use of these updated projections.

The City's TDF model was updated in 2011 as part of continued planning efforts to address transportation infrastructure needs and to assist in the City's 2030 General Plan Update. The intent of the City's TDF model update was to improve the accuracy of the model for local application while maintaining consistency with the structure of the VTA regional TDF model. Because the SEIR analysis is a subsequent analysis to the 2030 General Plan EIR and the Project is a change in the land use assumptions in the San Antonio Change Area, the land use and roadway assumptions in the 2011 TDF model were not updated again. Additionally, the 2040 projections did not become available until fall 2014, and the TIA was prepared in March 2014.¹ The changes between the 2035 and 2040 projections are not significant enough to warrant updating the information in the TIA. No additional impacts or new mitigation were identified as a part of this SEIR. No revisions to the Draft SEIR are necessary.

Comment 2-5

The comment states that the transportation section should include a discussion of the multimodal transportation elements that are envisioned for the bicycle improvement plan on California Street. Because Impact TRA-1 through Impact TRA-4 state that the transportation and circulation impacts are significant and unavoidable, Caltrans recommends further discussion in the SEIR of additional transit and active transportation strategies as mitigation measures, because all transportation improvements, including those for pedestrian, bicycle, and transit modes, are opportunities to improve safety and access for all travelers.

The California Street improvement plan has yet to begin its initial study phase. That study will consider the elimination or narrowing of vehicle lanes, increased areas for bicyclists, curb bulbs to reduce crossing width for pedestrians, and improved lighting and signage. Transit and active transportation strategies are considered in the 2030 General Plan and include shuttle services, creation of park-and-ride lots, and other TDM elements in use by both public agencies and private employers (e.g., bicycle parking, transit passes, parking cash-outs, etc.). Because this is subsequent analysis to the 2030 General Plan EIR only and does not amend the approved 2030 General Plan, no additional transit, bicycle, and pedestrian measures have been identified. Individual projects will be required to identify transit, bicycle, and pedestrian improvements.

¹ The Notice of Preparation of the SEIR was issued on September 11, 2013.

The SEIR considers all of the relevant 2030 General Plan policies that promote multimodal options but does not quantify reductions because there is no specific development tied to the Project. Additionally, because the SEIR is a programmatic analysis, any future development within the San Antonio Change Area will be required to adhere to the 2030 General Plan policies to the fullest extent possible. No revisions to the Draft SEIR are necessary.

Comment 2-6

The comment states that Caltrans encourages the City to locate new housing, jobs, and neighborhood services near mass transit centers and develop and assess the benefits of TDM measures to reduce congestion on state facilities.

The encouragement of TDM programs is noted. The City requires new developments, including those within the San Antonio Change Area, to establish TDM requirements that include trip reduction target goals, a monitoring program, and an enforcement component. In addition, the San Antonio Precise Plan, adopted in December 2014, includes TDM requirements applicable to the San Antonio Change Area. These requirements incorporate the minimum Greenhouse Gas Reduction Program (GGRP) targets and define more aggressive targets for future office development in the San Antonio Change Area, depending on the scope of the development. The General Plan Mobility Element also includes TDM requirements as an integral part of its strategy to measure multimodal system performance and “consider new mobility priorities, and to more effectively balance the needs of all travel modes.” Development in the San Antonio Change would be required to adhere these general plan policies. However, because there is no specific project tied to the SEIR, no project-specific TDM is proposed at this time. The majority of the San Antonio Change Area is within walking distance (0.5 mile) of the San Antonio Caltrain Station. No revisions to the Draft SEIR are necessary.

Comment 2-7

The comment states that secondary impacts on pedestrians and bicyclists as a result of traffic impact mitigation measures should be recognized and analyzed.

Secondary impacts on pedestrians and bicyclists are recognized as a part of all non-freeway widening mitigation measures (Mitigation Measure TRANS-2b from the 2030 General Plan EIR). These impacts will be analyzed as part of any proposed widening from individual projects. No revisions to the Draft SEIR are necessary.

Comment 2-8

The comment states that local jurisdictions are encouraged to coordinate with the Caltrans District Local Development – Intergovernmental Review Office to enable consideration of impacts.

The City coordinates with Caltrans early in the environmental review process for all development projects by soliciting input on the Notice of Preparation. Additionally, the City consults with Caltrans for any project that affects or is located adjacent to a state roadway facility. No revisions to the Draft SEIR are necessary.

Comment 2-9

The comment states that the City is encouraged to participate in VTA's voluntary contribution program and plan for the impact of future growth on the regional transportation system.

The City does not currently participate in VTA's voluntary contribution program but states in the 2030 General Plan that the policies for the San Antonio Change Area encourage higher intensities and increased diversity of land uses, with improved bicycle and pedestrian circulation and connections to public transportation, specifically the San Antonio Caltrain Station. At this time, there is no county or regional transportation impact fee program that would apply to the San Antonio Change Area. VTA is the agency responsible for planning and implementing improvements on regional transportation facilities in Santa Clara County. The City of Mountain View would support and participate in development of a regional fee program should it be proposed by VTA or other relevant agency. In the event a regional transportation impact fee is established, projects developed in the San Antonio Change Area could be required to pay the fee as part of their impact mitigation strategy. No revisions to the Draft SEIR are necessary.

Letter 3



January 8, 2015

City of Mountain View
Community Development Department
500 Castro Street
Mountain View, CA 94039

Attention: Margaret Netto

Subject: San Antonio Change Area Draft SEIR

Dear Ms. Netto:

Santa Clara Valley Transportation Authority (VTA) staff have reviewed the Draft Subsequent EIR (DSEIR) for an increase of 800,000 square feet of office space and 170 lodging rooms for the area generally bounded by San Antonio Road, California Street, Showers Drive, and El Camino. We have the following comments.

VTM Analysis

VTA supports the City's progressive approach to transportation analysis in the DSEIR and TIA, including the vehicle miles traveled (VTM) analysis, consistent with recent state legislation.

3-1

Significant Impacts to CMP Facilities

The TIA and DSEIR find that the segment of San Antonio Road between Central Expressway and California Street, which is a CMP facility, would degrade below established CMP standards under Year 2030 Conditions. The TIA notes that roadway segments could be widened to meet level of service standards, but "the additional pavement width and crossing distance conflicts with the City's multi-modal goals and desire to better balance transportation investments" (pg. 36). The TIA also notes that operational improvements could improve the situation but the City cannot guarantee their implementation. The impact is found significant and unavoidable.

3-2

VTA supports the City's approach to considering multi-modal goals in addition to auto LOS standards when making decisions about whether to pursue auto capacity-increasing mitigation measures. VTA notes that in cases where it is infeasible or undesirable to add capacity to a CMP facility that falls below the established CMP LOS threshold of E, the Multimodal Improvement Plan process is designed to allow local agencies to identify offsetting measures, such as multimodal improvements, to address the impacts. The Multimodal Improvement Plan contains a list of actions to help reduce automobile trips and support alternative modes (walking, bicycling and transit), and an implementation plan with specific responsibilities and a schedule. The preparation of a Multimodal Improvement Plan can provide an alternative to auto capacity-increasing mitigation measures for significant impacts to CMP facilities.

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City of Mountain View

January 8, 2015

Page 2

Freeway Impacts and Mitigation Measures

The TIA and DSEIR find that the project will have Significant Impacts on 8 segments of US 101. The TIA finds the impacts significant and unavoidable and notes that, "all of the segments are under Caltrans jurisdiction and the City of Mountain View cannot ensure that improvements to freeway segments are made" (pg. 39).

3-3

VTa notes that US 101 has an active Express Lanes Project under development by Santa Clara Valley Transportation Authority and Caltrans. Express Lanes in operation have been shown to provide improved travel speeds, lower levels of congestion, higher traffic throughput carrying capacity and overall improved traffic operations.

In cases of significant impacts on CMP facilities, a voluntary contribution to regional transportation improvements may be a feasible and reasonable mitigation measure to reduce the level of transportation impacts for the project. Several recent environmental documents prepared by lead agencies in Santa Clara County include such contributions as mitigation measures for significant freeway impacts. Accordingly, VTA requests that the City include a mitigation measure in the DEIR for future development projects in the Plan Area to provide voluntary contributions to regional improvements included in the Valley Transportation Plan 2040, such as the US 101 Express Lanes Project and/or other regional transportation improvements on the impacted freeways or parallel corridors.

3-4

Transportation Demand Management/Trip Reduction

In order to reduce the number of single occupant vehicle trips generated by the project, VTA recommends that the City establish requirements for future developments in the San Antonio Change Area to adopt Transportation Demand Management (TDM)/Trip Reduction measures. VTA recommends that the City establish trip reduction targets for future developments that meet or exceed the trip reduction targets established in the City's Greenhouse Gas Reduction Program. In addition, these measures could be made more effective by including a monitoring and enforcement component, and requiring future developments to participate in a Transportation Management Association (TMA).

3-5

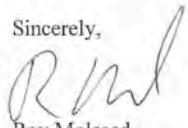
Effective TDM programs that may be applicable to the San Antonio Change Area include:

- * Parking pricing and parking cash-out programs
- * Public-private partnerships or employer contributions to improved transit service to the area (for example, shuttles to Caltrain or VTA Light Rail)
- * Transit fare incentives such as VTA Eco Pass, Caltrain Go Pass, or pre-tax commuter benefits
- * Bicycle lockers and bicycle racks
- * Showers and clothes lockers for bicycle commuters
- * Preferentially located carpool parking
- * Employee carpool matching services
- * Parking for car-sharing vehicles

City of Mountain View
January 8, 2015
Page 3

Thank you for the opportunity to review this project. If you have any questions, please call me at (408) 321-5784.

Sincerely,



Roy Molseed
Senior Environmental Planner

cc: Erik Alm, Caltrans
Brian Brandert, Caltrans

MV1310

Responses to Comment Letter 3 (VTA)

Comment 3-1

The comment states that VTA supports the City's progressive approach to transportation analysis because it is consistent with recent state legislation.

The support of the approach and City policies is noted. The 2030 General Plan policies, land use forecasts, and targeted areas are the result of an extensive outreach process among staff, policymakers, and the public to arrive at a process that uses new methods to analyze development impacts on the transportation system and balances competing concerns about accommodating growth, jobs, and quality of life. No revisions to the Draft SEIR are necessary.

Comment 3-2

The comment states that the segment of San Antonio Road between Central Expressway and California Street would degrade below CMP standards and that although the roadway segment could be widened, this would conflict with the City's multimodal goals. This approach is supported by VTA and a Multimodal Improvement Plan should be considered to offset the impact.

The support of the approach and City policies is noted. The San Antonio Precise Plan, approved in December 2014, generally corresponds with the San Antonio Change Area and establishes a set of improvements for the area. These improvements include widened and landscaped sidewalks; pedestrian routes to the Caltrain station; new bicycle lanes on San Antonio Road, California Street, and Pacchetti Way; and coordination with transit agencies to promote transit use. The San Antonio Precise Plan's policies correspond to the intent of a Multimodal Improvement Plan, which identifies measures that could offset potential impacts. The City is in the process of initiating a citywide Multimodal Improvement Plan, reflecting 2030 General Plan policy direction and addressing the effects of growth throughout the City with multimodal improvements throughout the system.

Individual transportation impact analyses for projects within the San Antonio Change Area will evaluate all modes of transportation. A condition of approval for The Village at San Antonio Center Phase II Project includes the creation of bicycle lanes on San Antonio Road fronting that project site, the addition of buffered bicycle lanes on California Street, and new pedestrian and bicycle connections throughout that project site and to the San Antonio Caltrain Station. It should also be noted that, even though it is within the city boundary, the segment of San Antonio Road between Central Expressway and California Street is a CMP facility, which is outside of the City's jurisdiction. Changes to this facility cannot be made without VTA approval. Impacts on intersections outside the City's jurisdiction are identified as significant and unavoidable, even with mitigation, because the City does not have the authority to enforce mitigation. No revisions to the Draft SEIR are necessary.

Comment 3-3

The comment states that the TIA and Draft SEIR found significant and unavoidable impacts on eight segments of US 101 because the City could not ensure improvements to freeway segments would be made. VTA notes that an express lanes project is under development on US 101 and express lanes have been shown to provide increased speeds and higher traffic volumes.

The US 101 Express Lanes project would convert 36 miles of carpool lanes to express lanes and add a second express lane in urbanized areas of Santa Clara County to the San Mateo county line. Solo drivers would have the option of paying a toll to use the express lane during commute hours. Carpools with two or more occupants, motorcycles, transit buses, and clean-air vehicles with applicable decals would continue to use the express lane free of charge.

If approved and constructed, the regional freeway improvements in the US 101 Express Lanes project would provide operational capacity benefits within the corridor, including more efficient use of the existing High-Occupancy Vehicle (HOV) lane. The express lanes are anticipated to open in 2018, pending funding.

For a lead agency to make findings that a mitigation measure that falls within the responsibility and jurisdiction of another public agency is feasible and would mitigate a significant effect, the measure must have been adopted by the agency or can and should be adopted by another agency. Feasible mitigation measures must be fully enforceable through permit conditions or other legally binding instruments and capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.

It is the City's understanding that Caltrans and VTA are currently conducting the required environmental review for the US 101 Express Lanes project, and therefore, the project is not an approved, committed project that could be relied upon by the City. Although implementation of the US 101 Express Lanes project is likely, it is not assured and thus cannot be relied upon as a feasible mitigation that would reduce the impacts associated with the Project. Additionally, at this time, studies are not available that indicate whether the addition of the second express lane would free up enough capacity to reduce the Project's impact on mixed-flow lanes to a less-than-significant level. The improvements may also not increase the freeway mainline/mixed-flow lane capacity, which would then not substantially change the results of the freeway analysis. The express lanes project would not directly mitigate freeway impacts on mixed-flow lanes because the Project would add trips equal to or greater than one percent of the freeway segment's capacity to a freeway segment currently operating at LOS F. At this time, studies are not available to indicate whether the addition of a second express lane would improve the LOS of the mixed-flow lanes to LOS E or free up enough mixed-flow lane capacity to reduce the Project's impact to a less-than-significant level.

Although it is agreed that the US 101 Express Lanes project will provide increased speeds and higher traffic volumes, the express lanes project has not been completed and is not under the jurisdiction of the City; therefore, it was not included in the analysis. No revisions to the Draft SEIR are necessary.

Comment 3-4

The comment states that the City is encouraged to participate in VTA's voluntary contribution program and plan for the impact of future growth on the regional transportation system.

The City does not currently participate in VTA's voluntary contribution program but states in the 2030 General Plan that the policies for the San Antonio Change Area encourage higher intensities and increased diversity of land uses, with improved bicycle and pedestrian circulation and connections to public transportation, specifically the San Antonio Caltrain Station. At this time, there is no county or regional transportation impact fee program that would apply to the San Antonio Change Area. VTA is the agency responsible for planning and implementing improvements on regional transportation facilities in Santa Clara County. The City of Mountain View would support

and participate in development of a regional fee program should it be proposed by VTA or other relevant agency. In the event a regional transportation impact fee is established, projects developed in the San Antonio Change Area could be required to pay the fee as part of their impact mitigation strategy. As noted in Response to Comment 3-2, the City is also in the process of initiating a Multimodal Improvement Plan to address potential citywide growth impacts that affect both local and CMP roadways. No revisions to the Draft SEIR are necessary.

Comment 3-5

The comment states that VTA encourages the City to establish TDM requirements and that trip reduction targets for future developments meet or exceed the trip reduction targets established in the Greenhouse Gas Reduction Program. Additionally, a monitoring program with an enforcement component should be included.

The support of the TDM program is noted. The 2030 General Plan includes policies to develop, adopt, and monitor TDM strategies for land development projects in the San Antonio Change Area. New developments are required by the City to establish TDM requirements that include trip reduction target goals, a monitoring program, and an enforcement component. For example, The Village at San Antonio Center Phase II Project, within the San Antonio Change Area, is required by the City to establish TDM measures to generate a 30 percent reduction in vehicle trips. To achieve the 30 percent trip generation reduction goal, a TDM program was developed that includes descriptions of the variety of TDM strategies to be implemented on the site, the party responsible for each measure (e.g., building management or individual employers), the monitoring process, and penalties for noncompliance. Elements of the TDM program include reserved parking spaces for carshare programs, transit subsidies for employees, plug-in stations for electric vehicles, and bicycle racks throughout the site. The San Antonio Precise Plan, adopted in December 2014, includes TDM requirements applicable to the San Antonio Change Area. These requirements incorporate the minimum GGRP targets and define more aggressive targets for future office development in the San Antonio Change Area, depending on the scope of the development. These requirements are enforceable by the City through future project conditions of approval, including monitoring and enforcement mechanisms with monetary penalties for non-performance. No revisions to the Draft SEIR are necessary.

Letter 4



**CITY OF
PALO
ALTO**
250 Hamilton Avenue, 5th Floor
Palo Alto, CA 94301
650.329.2441

PLANNING & COMMUNITY ENVIRONMENT

January 15, 2015

Rebecca Shapiro, Associate Planner
City of Mountain View
Community Development Department
500 Castro Street
Mountain View, CA 94039

**Subject: City of Mountain View 2030 General Plan and Greenhouse Gas Reduction Program, San Antonio Change Area
Draft Subsequent Environmental Impact Report, State Clearinghouse #2013092026**

Dear Ms. Shapiro:

The City of Palo Alto would like to take this opportunity to provide comments on the Draft Subsequent Environmental Impact Report for the City of Mountain View 2030 General Plan and Greenhouse Gas Reduction Program, San Antonio Change Area (the "Project"). The plan highlights the proposed San Antonio Change area located near the PA/MV border. Common arterial corridors of interest to both communities from the change include Central Expressway/Alma Street, San Antonio Road, and El Camino Real.

A. Transportation

1. Table IV.C-2 discusses roadway segments analyzed in the study including San Antonio Rd between US 101 and Charleston Rd. The section of San Antonio Rd that may be most impacted by the Change Area includes the segment of San Antonio Rd from Charleston Rd to Central Exp and no analysis in this section appears to have taken place. Link Level (V/C) analysis segment should be considered along with traditional Level of Service (LOS) analysis that is already understood by the community to better compare the potential change from the proposed project. The same table highlights Significant Impacts in LOS along San Antonio Road but no quantitative mitigation measures are proposed.

4-1

4-2

4-3

The City of Palo Alto proposes the following Mitigation Measure to address this significant but unavoidable impact:

4-4

Palo Alto Comment Letter
1/15/15
Page 2

Mitigation Measure: The City of Mountain View will collect fees for the fair share cost of feasible mitigations in adjacent communities and place them in an escrow account for future improvements.

4-4 Cont.

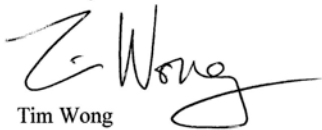
2. Where Significant and Unavoidable mitigation is referenced due to "increase in daily vehicle traffic or degradation of traffic operation" is assumed, local and regional program mitigation should be discussed and considered in the DEIR including local-sponsored transit programs to serve the Change Area. MV can consider partnering with the City of Palo Alto, the Valley Transportation Authority, or other local transit operators to expand a more robust transit system to help create better transit links for the Change Area. Given the overlap between the two communities, synergy opportunities can be easily identified as feasible mitigation for the project.
3. The study should also consider better bicycle/pedestrian facility connections to the Change Area but no discussion in the DEIR is provided. Citing San Antonio Road as a specific example, a 15% change in vehicle volumes is expected between Central Exp and California St. No discussion is provided in the DEIR in regards to the need for better bicycle or pedestrian facilities. Feasible mitigation, although costly, can include the reconstruction of roadway facilities over Central Expressway to support bicycle/pedestrian connections.

4-5

4-6

The City of Palo Alto requests consideration and cooperation to address the above mentioned items.

Sincerely,



Tim Wong
Interim Advance Planning Manager

Cc: Hillary Gitelman, Director
Jonathan Lait, Assistant Director
Jaime Rodriguez, Chief Transportation Official



CityOfPaloAlto.org

Printed with soy-based inks on 100% recycled paper processed without chlorine.

Responses to Comment Letter 4 (City of Palo Alto Planning and Community Environment Department)

Comment 4-1

The comment states that the section of San Antonio Road between Charleston Road and Central Expressway is not included in this analysis.

Because this is a subsequent EIR to the 2030 General Plan EIR, roadway segments were chosen to be consistent with the traffic analysis in the previously certified 2030 General Plan EIR. The transportation analysis considered the operations of 47 of the most critical arterial and expressway roadway segments that affect citywide circulation within and near Mountain View. These study locations were selected in consultation with City staff and were based on select zone analysis from the City of Mountain View travel demand model that indicated critical travel patterns within the community. No revisions to the Draft SEIR are necessary.

Comment 4-2

The comment states that in addition to the link-level LOS analysis provided, volume-to-capacity analysis should be considered to compare the potential change from the proposed project better.

Because this is a subsequent analysis to the 2030 General Plan EIR, the travel demand forecasting model was used to estimate the impacts to the capacity of roadway facilities on a link-level basis in Mountain View and nearby jurisdictions. This is consistent with the model used for the traffic analysis in the 2030 General Plan EIR. The results from the 2030 General Plan EIR are shown for comparative purposes in the TIA (i.e., “Scenario 2”). Daily roadway capacity is an indicator of roadway segment operations at the general plan planning level. This approach helps to evaluate and determine the roadway cross-sections at a programmatic level rather than detailed operational issues at the intersection level, an analysis that is dependent on the number of turn lanes, signal timing, adjacent driveway operations, and development details and locations that are not typically known at the time of a program-level general plan analysis. Table 4 of the TIA shows the LOS capacity thresholds for each type of facility. No revisions to the Draft SEIR are necessary.

Comment 4-3

The comment states that Table IV.C-2 highlights significant impacts along San Antonio Road without proposing quantitative mitigation measures.

Mitigation measures to offset these impacts would traditionally be roadway widening. Although affected roadway segments could be widened, this would conflict with the City’s multimodal goals. All mitigation measures, including Mitigation Measure TRANS-2b, that were identified in the 2030 General Plan EIR apply to the development considered in the SEIR. The SEIR analyzes whether additional growth in the San Antonio Change Area would result in any new impacts that would require new mitigation measures not previously identified. Mitigation Measure TRANS-2b was determined to not fully mitigate roadway segment impacts because the roadway widening improvements could conflict with the City’s multimodal policies and physical constraints; it cannot be ascertained at this time that the operational improvements would fully mitigate the impacts. No new mitigation measures have been identified to mitigate impacts along San Antonio Road. At this

time, no additional transit, bicycle, and pedestrian measures have been identified to add to the 2030 General Plan, but more specific improvement standards (based on 2030 General Plan policy direction) are included for the San Antonio Change Area in the adopted San Antonio Precise Plan, which affects segments of San Antonio Road within the City's jurisdiction. Individual projects will identify transit, bicycle, and pedestrian improvements in compliance with the 2030 General Plan and San Antonio Precise Plan as well as any feasible improvements necessary to address project-level environmental analysis. No revisions to the Draft SEIR are necessary.

Comment 4-4

The comment proposes a mitigation measure to address the significant and unavoidable impact on San Antonio Road between US 101 and Charleston Road. The proposed mitigation measure is to collect fair share costs of feasible mitigations in adjacent communities and place them in an escrow account for future improvements.

See response to Comment 4-3. The City will not pursue roadway widening as part of the SEIR. The 2030 General Plan states that "widening a road to achieve a lower volume to capacity ratio results in higher expenditure of infrastructure dollars for wider roadways that do not necessarily serve all users of the circulation system. Roadway widening also provides capacity that is not needed for the majority of the day outside of the peak periods. Furthermore wider roadways, in general, are inconsistent with goals promoting a more livable city, cause greater impacts to biological resources and discourage roadway use by pedestrians and bicyclists." At this point, no other feasible mitigations have been proposed. With the changes in land use in the San Antonio Change Area, the level of significance at the intersection has not changed since the analysis in the General Plan EIR, though the intensity has increased. There is no new impact at this location. The General Plan EIR includes Mitigation Measure TRANS-2b, which indicates that there is no feasible mitigation for this location because it is outside of Mountain View's jurisdiction, and Mountain View has no authority to implement road widening. The commenter is requesting that Mountain View impose a mitigation measure that would require the City to collect fair share costs for feasible mitigations in adjacent communities; then, Palo Alto could use that money to improve the roadway segment. Currently, no cross-jurisdictional program is in place to fund local improvements in adjacent communities. The 2030 General Plan encourages collaborative services and improvements; however, because no program is in place and no specific improvements have been identified, the proposed mitigation measure is speculative and could not be guaranteed to mitigate the impact. No revisions to the Draft SEIR are necessary.

Comment 4-5

The comment states that where significant and unavoidable impacts are referenced because of an "increase in daily vehicle traffic or degradation of traffic operation," local and regional program mitigation should be considered. This mitigation should include partnering with local agencies to expand transit services.

The 2030 General Plan encourages the use of transit services by improving access to transit and creating a land use context supportive of transit travel. At this time, every property in Mountain View is within 0.5 to 0.75 mile of at least one transit route, and these distances are much smaller in the vicinity of the San Antonio Change Area. According to peak load factor data from March 2013 provided by VTA, existing transit services are well under capacity for most of the day. The City is a willing partner with VTA and the City of Palo Alto regarding the transit network should further

improvements be proposed related to projects within Mountain View. Currently, such partnerships are speculative and do not include specific projects with quantitative benefits, which are necessary and appropriate for mitigation measures. Additionally, the City requires office developments to join a transportation management association to fund cooperative programs and services, such as shuttle services, in the city. The City currently provides the MVgo shuttle, which is a fare-free service that is open to the public and runs on weekdays out of the Mountain View Transit Center. No revisions to the Draft SEIR are necessary.

Comment 4-6

The comment states that the study should consider better bicycle/pedestrian connections to the San Antonio Change Area and not enough discussion of this topic is provided in the Draft SEIR. Feasible mitigations should also be considered, including reconstruction of roadway facilities over Central Expressway to support bicycle/pedestrian connections.

The San Antonio Change Area SEIR is intended to provide a subsequent analysis to the 2030 General Plan EIR to account for any additional trips associated with the proposed change in land uses with respect to roadway capacity only. These trips are predominantly vehicle trips, and no new impacts were identified that warrant improvements to pedestrian and bicycle facilities beyond those identified in the 2030 General Plan EIR.

Individual transportation impact analyses for the projects within the San Antonio Change Area will evaluate all modes of transportation and improve on bicycle and pedestrian facilities as appropriate. Conditions of approval for The Village at San Antonio Center Phase II project, for example, include the creation of bicycle lanes on San Antonio Road fronting the project, the addition of buffered bicycle lanes on California Street, and new pedestrian and bicycle connections throughout the project site and to the San Antonio Caltrain Station. The San Antonio Precise Plan also evaluates and identifies (at a program level) improved bicycle and pedestrian connections throughout the San Antonio Change Area as well as potential funding sources and implementation strategies. However, the complete costs and designs for these improvements are unknown at this time. Nevertheless, future development projects within the San Antonio Change Area would comply with bicycle and pedestrian policies in the San Antonio Precise Plan. In addition, the City of Mountain View recently completed a Pedestrian Master Plan (2014) to improve access to transit, connect the pedestrian network throughout the city, and improve access to employment and retail centers. A major update to the City of Mountain View Bicycle Transportation Plan (previously dated 2008) is under way and planned for circulation in 2015. As noted in Response to Comment 3-2, the City is also in the process of initiating a citywide Multimodal Improvement Plan. No revisions to the Draft SEIR are necessary.

Chapter III

Text Revisions to the Draft SEIR

This chapter includes revisions to the Draft SEIR by errata, as allowed by CEQA. The revisions are presented in the order they appear in the Draft SEIR, with the relevant page number(s) indicated with italicized print. New or revised text is shown with underline for additions and ~~strikeout~~ for deletions.

All text revisions are to provide clarification or additional detail. After considering all comments received on the Draft SEIR, the Lead Agency has determined that the changes do not result in a need to recirculate the Draft EIR. Under the CEQA Guidelines, recirculation is required when new significant information identifies:

- A new significant environmental impact resulting from the project or from a new mitigation measure proposed to be implemented;
- A substantial increase in the severity of an environmental impact, unless mitigation measures are adopted that reduce the impact to a level of insignificance;
- A feasible project alternative or mitigation measure, considerably different from others previously analyzed, that clearly would lessen the significant environmental impacts of the project, but the project's proponents decline to adopt; or
- The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded (Guidelines Sec. 15088.5[a]).

Recirculation of a draft EIR is not required where the new information merely clarifies, amplifies, or makes minor modifications to an adequate EIR (CEQA Guidelines Section 15088[b]). The information provided below meets those criteria.

Chapter IV – Setting, Impacts, and Mitigation Measures

IV.B Population, Housing, and Employment

Page IV.B-8, Table IV.B-6, Jobs-to-Housing Unit and Jobs-to-Employed Resident Comparison, is revised as follows:

Table IV.B-6. Jobs-to-Housing Unit and Jobs-to-Employed Resident Comparison

Unit	2009 (2012 General Plan Baseline)	Adopted 2030 General Plan	Updated 2030 Projection
Jobs ^a	60,460	80,830	87,570
Housing Units	33,270	41,130	41,130
Employed Residents ^{a,b}	38,260	47,300	47,300
Jobs/Housing Unit	1.8	2.0	2.1
Jobs/Employed Residents	1.6	1.7	1.9

^a The total number of jobs is city-wide/cumulative and includes potential new jobs that could occur in the East Whisman Change Area (approximately 4,230 new jobs). If additional development does not occur in the East Whisman Change Area as analyzed, then the Jobs/Housing Unit and Jobs/Employed Residents ratios would be less.

^b The number of employed residents is based on an estimate of 1.15 employed residents per household.

Sources: City of Mountain View 2010 and City of Mountain View 2011.